

Privacy Policy ex Legislative Decree 30th June 2003, n°. 196 (Privacy Code) and EU Regulation 2016/679

Dear Customer, Supplier and User,

1. Premise/Introduction

LG SRL, located in Via Tazio Nuvolari n. 74, Misano Adriatico (RN), VAT code IT 03298610407 (hereinafter referred to, for the sake of simplicity, as “**LG**” or “**Controller**”), is committed to safeguarding your personal data to the greatest possible extent.

Here below you will find our privacy policy, which describes the manner in which we collect and process your personal data, with this policy conforming to Legislative Decree of 30th June 2003, n° 196 (Privacy Code) and the New EU Regulation 2016/679 (GDPR).

Please note that we have tried to draft this document in the clearest possible manner. However, considering the technical issues involved, should you need any further information or clarifications, please do not hesitate to contact us at the contact details provided below.

Furthermore, we wish to inform you that the privacy policy of LG. may be subject to modifications following on from the issuing of new regulations and/or the introduction of new services. We therefore invite you to periodically check for any privacy policy modifications/updates on our website: www.anvera.it (hereinafter referred to as “**the Website**”).

2. What is a personal data

We would like to inform you as to the meaning of personal data, which refers to any information by means of which it is possible to identify, or to render identifiable with reasonable ease, a physical person (hereinafter referred to, for the sake of simplicity, as “**Data**”).

3. What is a processing

The processing of Data includes the following operations: collection, registration, organisation, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of Data.

4. Who is involved in processing your personal data

The Controller of your personal data is LG SRL, located in Via Tazio Nuvolari n. 74, Misano Adriatico (RN), VAT code IT 03298610407, E-mail: info@lg-technologyhub.it – Tel-: (+39) 0541 613932 - Mobile: (+39) 392 9850825.

LG. is not, in accordance with art. 37 and subsequent articles of the New Regulation, obliged to nominate a DPO (Data Protection Officer).

An updated list of the processors and of the other persons responsible for processing, including nominated professionals, is held at the legal premises of the Controller.

5. What Data do we process

LG processes a series of Data which are collected in order to carry out a number of business activities, and in particular for the purposes listed in paragraph which follows. Indeed, LG processes Data such as name, surname, tax code, e-mail, phone number, bank references. Therefore, LG does not process special categories of Data, such as data concerning health, genetic or biometric data, nor data relating to criminal convictions and offences.

Should you provide us with the Data of third parties, you will be required to take all necessary steps to ensure that the communication of the Data to the Controller and our consequent processing of the same comply with the applicable provision. Therefore, for example, before providing us with the Data of third parties, you should duly inform such parties and obtain their consent to processing, if required by the aforementioned provision.

The optional, explicit and voluntary sending of email to the addresses specified on the Website, will result in the acquisition of the address of the sender, which is required in order to reply to requests, as well as in the acquisition of any other personal data included in the communication.

At the same time, any requests made via the Website "*form*" involve the acquisition of the email address of the user, which is necessary in order to fulfil the requests made by the same, as well as the acquisition of the data and information contained in the *form* and in the messages.

In the case of curricula vitae sent by free choice to the email addresses specified on the Website, the personal data therein contained will be collected and processed for the purposes set out in the following paragraph.

In addition, your personal data is collected by cookies. For further information refer to our Cookies Policy.

6. **Why do we process Data**

LG processes Data for the following purposes:

- a) To complete necessary precontractual activities (e.g. sending of quotations, verification of credit rating and solvency);
- b) To carry out contractual and taxation obligations towards yourself;
- c) To protect our assets and/or defend our rights on the basis of our legitimate interests;
- d) To fulfil legal requirements and comply with requests of authorities, as well as to comply with fraud and money laundering prevention provisions, etc.;
- e) To reply to requests sent via email or via the Website *form*;
- f) To evaluate the profile of candidates and select the same, where these have sent curricula of their own free choice;
- g) Carry out direct marketing through automated processes (e.g. newsletter), in case your express consent has been given, or in case such activities may be considered as an LG's legitimate interest. However, you shall have the right to oppose the processing of Data for the purpose of marketing at any time, by contacting us (as indicated below), or for instance by unsubscribing from the newsletter (OPT OUT procedure).

Please note that in determining the existence of a legitimate interest, we balance the different potential opposite interests, ie that of LG to carry out a specific activity, and the fundamental right of each individual. LG may rely on a legitimate interest provided that the individual rights shall not contrast with nor prevail over LG interests, taking into consideration the reasonable expectations of the data subject, based on his / her relationship with the Controller.

7. **Is it necessary to provide my personal data or consent**

The provision of data for the purposes set out in previous clause letters a) – d) is obligatory. Should it not be provided then contract execution cannot be guaranteed.

The provision of data for the purposes set out in previous clause letters e) – g) is instead optional. Therefore, you may decide not to provide data or to successively deny the possibility to process previously-supplied data: in such case, failure to provide data may mean that it is not possible to fulfil your requests or evaluate potential job applications.

In relation to the purposes for which explicit consent is requested from yourself, failure to provide consent does not constitute a valid reason for the Controller to withdraw from a contract or to not fulfil your requests in relation to other purposes.

8. How do we process Data

LG processes Data in both printed and electronic form. In such context, LG will guarantee the logistic and physical security of the Data and, in general, the confidentiality of the Data processed, by taking all necessary technical and organisational measures.

9. Where is your Data stored and where is it transferred to

The Data is processed at the operative premises of the Controller as well as in any other place where the parties involved in the processing are located. For further information, please contact us as indicated below.

The Data is held in electronic form on servers located within the European Union. In all cases, it should be understood that LG, should it prove necessary, will have the faculty to move the server to non-EU countries. In such case, LG guarantees from hereon in that the transfer of Data outside of the EU will take place in accordance with applicable legal provisions following on from the stipulation of standard contractual clauses provided for by the European Commission or in conformity with the Privacy Shield, in relation to those countries that do not, according to the European Commission, offer adequate provisions.

10. Who is your Data communicated to

Without having to obtain your express consent, LG may communicate your Data, for the above referred to purposes, to prefectures, insurance supervision institutes (such as IVASS), judicial authorities, insurance companies (for the provision of insurance-related services), as well as to parties to which such communication is required by law for the fulfilment of the afore-mentioned purposes. Said parties will process the Data as autonomous controllers. Your Data will not be disclosed without previous and explicit consent.

11. Who can access your Data

Your Data may be made accessible for the above- mentioned purposes:

- To employees and collaborators of the Controller, in their role as persons responsible for processing and/or internal processors and/or system administrators;
- To third parties or other parties (such as, for example, credit institutes, professional offices, consultants, insurance companies for the provision of insurance services, etc.) that carry out activities which have been outsourced by LG, in their role as external processors or co-controllers should they process Data for their own purposes.

12. How long do we hold your Data for

Your Data will be held in accordance with the principles of proportionality and necessity, and until the purposes for which it was collected have been fulfilled.

With specific regards to business relationship, your Data will normally be held for as long as there is a negotiated relationship with LG, with the exception of exigencies relating to the collection of residual credit and/or the management of Data in the hypothesis of any contestations or claims.

In all cases, your Data will be cancelled automatically 11 (eleven) years after the end of the contractual relationship.

13. **What are your rights**

As the interested party, you have the right to:

- a) Know if the Controller holds and/or processes your Data, obtaining information relative to the: origin, category, purposes and method of processing, the recipients to whom such data can be communicated, the logic applied in the case of processing carried out by electronic means, the period for which data is held; as well as the right to access the same in its entirety and obtain a copy (art. 15 **Right of access**);
- b) Have rectified Data that relates to yourself and to complete Data which is incomplete (Art. 16 **Right to rectification**);
- c) Obtain the cancellation of Data in possession of the Controller where such cancellation is provided for by the New Regulation (art. 17 **Right to erasure – Right “to be forgotten”**)
- d) Request the Controller to limit the processing to only certain Data, where this is provided for by the New Regulation (Art. 18 **Right to restrict processing**);
- e) Be informed as to who the recipients to whom any rectifications, cancellations or processing restrictions have been communicated are (art. 19 **Obligation of notification**);
- f) Request and receive all your Data, in a format that is structured, commonly used and readable on an automatic device or to request its transmission to another controller without impediment (Art. 20 **Right to portability**);
- g) Oppose entirely or in part, the processing of Data for the purposes of marketing (sending of advertising material, direct sales, market research and commercial communications) and for the purposes of profiling connected to such marketing (art. 21 **Right of opposition**).

Finally, you have the right to present a claim/petition directly to the Personal Data Protection Authority, located at Piazza di Montecitorio n°. 121 – 00186 ROME, Italy tel. (+39) 06.696771 and Fax: (+39) 06.69677.3785. The exercise of the rights set forth in this paragraph is completely free of charge.

14. **How can you exercise your rights**

At any time, you may exercise your rights by sending a registered letter with return receipt addressed to LG SRL, Via Tazio Nuvolari n. 74, Misano Adriatico (RN), or an e-mail to info@lg-technologyhub.it.